



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



MAR 19 2013

Gerardo C. Rios, Chief  
Permits Office  
Air Division  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

Re: **Notice of Minor Title V Permit Modification**  
**District Facility # N-811**  
**Project # N-1130219**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Stockton RWCF is proposing a Title V minor permit modification to modify Permit to Operate (PTO) N-811-23-5 of the facility's current Title V operating permit. The applicant is proposing to remove a compliant dormant internal combustion engine from dormant status.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTO N-811-23-6, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Sincerely,

David Warner  
Director of Permit Services

Enclosures

cc: James Harader, Permit Services

**Sayed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



MAR 19 2013

Debbie Livermore  
Stockton RWCF  
2500 Navy Drive  
Stockton, CA 95206

**Re: Notice of Minor Title V Permit Modification  
District Facility # N-811  
Project # N-1130219**

Dear Ms. Livermore:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to modify Permit to Operate (PTO) N-811-23-5 of the current Title V operating permit. The applicant is proposing to remove a compliant dormant internal combustion engine from dormant status.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTO N-811-23-6, application, and previous Title V permit. This project will be finalized after the 45-day EPA comment period.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupl Gill at (209) 557-6400.

Sincerely,

David Warner  
Director of Permit Services

Enclosures  
cc: James Harader, Permit Services

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Executive Director/Air Pollution Control Officer

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## **TITLE V APPLICATION REVIEW**

Minor Modification  
Project #: N-1130219

Engineer: James Harader  
Date: February 19, 2013

Facility Number: N-811  
Facility Name: Stockton RWCF  
Mailing Address: 2500 Navy Drive  
Stockton, CA 95206

Contact Name: Debbie Livermore  
Phone: (209) 937-8852

Responsible Official: Mel Lytle  
Title: Director

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### **I. PROPOSAL**

Stockton RWCF is proposing a TV minor permit modification to remove a compliant dormant emission unit from dormant status. Since the unit was determined to be a compliant dormant emission unit, an Authority to Construct permit is not required to resume operation of the unit (per District Policy).

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

### **II. FACILITY LOCATION**

This facility is located at 2500 Navy Drive in Stockton, CA.

### **III. EQUIPMENT DESCRIPTION**

**N-811-23-6:** 1,408 HP WAUKESHA MODEL L7042GLD DIGESTER GAS/NATURAL GAS-FIRED LEAN BURN PRECOMBUSTION CHAMBER TYPE IC ENGINE WITH SILOXANE SCRUBBER POWERING AN ELECTRICAL GENERATOR (DUAL SILOXANE FILTER SYSTEM (SCRUBBER) USED TO SCRUB THE DIGESTER GAS PRIOR TO COMBUSTION IN ENGINES N-811-21, -22, & -23)

#### IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

#### V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

#### VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Modified Conditions			
Previous TV PTO Condition #	ATC Condition #	New TV PTO Condition #	Proposed Changes to Conditions
None			

Removed Conditions	
Previous TV PTO Condition #	Proposed Changes to Conditions
1	This condition requires the facility to submit an application to modify the TV permit in accordance with the timeframes and procedures of District Rule 2520. This condition has been satisfied and the requirement has not been included on the new permit.
2	This condition states that operation of the unit is not authorized until modifications are made to comply with District Rules, as authorized by an Authority to Construct permit. After reviewing the permit conditions, it was determined that the no modifications are necessary to comply with the District Rules. Therefore, an Authority to Construct is not required and this condition has been satisfied.
3	This condition requires the fuel lines to be physically disconnected from the unit. Since the unit will no longer be dormant, this condition will be removed from the Permit to Operate.
4	This condition states that source testing is not required while the unit is dormant. The unit will no longer be in dormant status and the operator has committed to testing the unit within 60 days of restarting the unit. Therefore, this condition will be removed from the new permit.

Added Conditions	
New TV PTO Condition #	Proposed Changes to Conditions
There were no conditions added to the permit.	

## **VII. COMPLIANCE**

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or Conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or Condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and Conditions include;
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## **VIII. ATTACHMENTS**

- A. Proposed Modified Title V Operating Permit
- B. Title V Compliance Certification Form
- C. Previous Title V Operating Permit

# ATTACHMENT A

Proposed Modified Title V Operating Permit

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-811-23-6

**EXPIRATION DATE:** 11/30/2013

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 1,408 HP WAUKESHA MODEL L7042GLD DIGESTER GAS/NATURAL GAS-FIRED LEAN BURN PRECOMBUSTION CHAMBER TYPE IC ENGINE WITH SILOXANE SCRUBBER POWERING AN ELECTRICAL GENERATOR (DUAL SILOXANE FILTER SYSTEM (SCRUBBER) USED TO SCRUB THE DIGESTER GAS PRIOR TO COMBUSTION IN ENGINES N-811-21, -22, & -23). NON-COMPLIANT DORMANT EMISSIONS UNIT.:

## PERMIT UNIT REQUIREMENTS

1. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. In lieu of installing a nonresettable fuel meter, the owner or operator may use a non-resettable elapsed operating time meter in conjunction with the engine manufacturer's maximum rated fuel consumption to determine monthly fuel usage. [District Rule 4702] Federally Enforceable Through Title V Permit
2. The NO<sub>x</sub> emissions shall not exceed 0.87 grams/bhp-hr (65 ppmv @ 15% O<sub>2</sub>). [District NSR Rule and 4702] Federally Enforceable Through Title V Permit
3. The CO emissions shall not exceed 2.65 grams/bhp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The VOC emissions shall not exceed 0.75 grams/bhp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The SO<sub>x</sub> emissions shall not exceed 0.14 grams/bhp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The PM<sub>10</sub> emissions shall not exceed 0.1 grams/bhp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The hydrogen sulfide concentration of the influent digester gas shall not exceed 170 ppmv prior to combustion. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Source testing to demonstrate compliance with the NO<sub>x</sub>, CO, VOC, SO<sub>x</sub> and PM<sub>10</sub> limits of this permit shall be conducted at least once every 24 months. [District NSR Rule, 4701, and 4702] Federally Enforceable Through Title V Permit
9. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. Sampling facilities for source testing shall be provided in accordance with the provisions of District Rule 1081 (as amended 12/16/93). [District Rule 1081] Federally Enforceable Through Title V Permit
12. Source testing for NO<sub>x</sub> shall be conducted utilizing CARB method 100 or EPA method 7E. [District Rule 4701] Federally Enforceable Through Title V Permit
13. Source testing for CO shall be conducted utilizing CARB method 100 or EPA method 10. [District Rule 4701] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

14. Source testing for VOC emission concentration shall be conducted utilizing EPA method 25 or EPA method 18, referenced as methane. [District Rule 4701] Federally Enforceable Through Title V Permit
15. Source testing for SOx shall be conducted utilizing EPA method 8 and ARB method 100. [District Rule 4801] Federally Enforceable Through Title V Permit
16. Source testing for PM10 emissions shall be conducted utilizing CARB method 501 in conjunction with CARB method 5, EPA methods 201 and 202 or EPA methods 201A and 202. If the facility agrees that the PM10 emissions are equal to the total particulate matter emissions then source testing for PM10 may be conducted utilizing CARB method 5 including the back half or CARB method 17 including the back half. [District NSR Rule] Federally Enforceable Through Title V Permit
17. The permittee shall monitor the hydrogen sulfide influent concentration on a daily basis with the use of a Draeger tube or District approved equivalent method. [District NSR Rule] Federally Enforceable Through Title V Permit
18. The permittee shall monitor and record the stack concentration of NOx at least once every calendar quarter (in which a source test is not performed) using a portable emission monitor that meets District specifications. All emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of O2 at least once every month using a portable emissions monitor that meets District specifications. [In-stack O2 monitors may be allowed if approved by the APCO]. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 1 day of restarting the engine unless monitoring has been performed within the last month. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
20. The exhaust gas O2 concentration shall be maintained between 8.83 to 9.20 % O2 for digester gas and between 9.55% to 9.89% for natural gas. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
21. If the concentration, as measured by the portable analyzer, is outside the permitted range, the permittee shall return the O2 to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue outside the permitted range after 8 hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within the 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
22. The permittee shall maintain records of: (1) the date and time of O2 and NOx measurements, (2) the O2 and NOx concentration in percent, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions limits with the acceptable range. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
23. Records of the quantity and type of fuel burned, in BTUs, the influent hydrogen sulfide concentration, and of the annual SOx emissions shall be kept. [District NSR Rule] Federally Enforceable Through Title V Permit
24. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# ATTACHMENT B

Title V Compliance Certification Form

San Joaquin Valley  
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

☐ SIGNIFICANT PERMIT MODIFICATION  
☒ MINOR PERMIT MODIFICATION

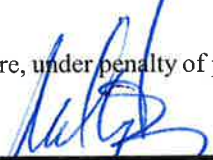
☐ ADMINISTRATIVE  
AMENDMENT

COMPANY NAME: City of Stockton, Municipal Utilities/Regional Wastewater Control	FACILITY ID: N - 811
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input checked="" type="checkbox"/> Utility	
2. Owner's Name: City of Stockton	
3. Agent to the Owner: C. Mel Lytle, Ph.D	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

  
\_\_\_\_\_  
Signature of Responsible Official

2/1/13  
\_\_\_\_\_  
Date

Mel Lytle  
\_\_\_\_\_  
Name of Responsible Official (please print)

Director  
\_\_\_\_\_  
Title of Responsible Official (please print)

# ATTACHMENT C

Previous Title V Operating Permit

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-811-23-5

**EXPIRATION DATE:** 11/30/2013

**EQUIPMENT DESCRIPTION:**

1,408 HP WAUKESHA MODEL L7042GLD DIGESTER GAS/NATURAL GAS-FIRED LEAN BURN PRECOMBUSTION CHAMBER TYPE IC ENGINE WITH SILOXANE SCRUBBER POWERING AN ELECTRICAL GENERATOR (DUAL SILOXANE FILTER SYSTEM (SCRUBBER) USED TO SCRUB THE DIGESTER GAS PRIOR TO COMBUSTION IN ENGINES N-811-21, -22, & -23). NON-COMPLIANT DORMANT EMISSIONS UNIT.

## PERMIT UNIT REQUIREMENTS

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1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Operation of the unit is not authorized until modifications are made to comply with District Rules as authorized by an Authority to Construct. [District Rule 2010]
3. The fuel lines shall be physically disconnected from the unit. [District Rule 2080]
4. While dormant, normal source testing shall not be required. [District Rule 2080]
5. The permittee shall install and operate a nonresettable fuel meter and a nonresettable elapsed operating time meter. In lieu of installing a nonresettable fuel meter, the owner or operator may use a non-resettable elapsed operating time meter in conjunction with the engine manufacturer's maximum rated fuel consumption to determine monthly fuel usage. [District Rule 4702] Federally Enforceable Through Title V Permit
6. The NO<sub>x</sub> emissions shall not exceed 0.87 grams/bhp-hr (65 ppmv @ 15% O<sub>2</sub>). [District NSR Rule and 4702] Federally Enforceable Through Title V Permit
7. The CO emissions shall not exceed 2.65 grams/bhp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The VOC emissions shall not exceed 0.75 grams/bhp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The SO<sub>x</sub> emissions shall not exceed 0.14 grams/bhp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The PM<sub>10</sub> emissions shall not exceed 0.1 grams/bhp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The hydrogen sulfide concentration of the influent digester gas shall not exceed 170 ppmv prior to combustion. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Source testing to demonstrate compliance with the NO<sub>x</sub>, CO, VOC, SO<sub>x</sub> and PM<sub>10</sub> limits of this permit shall be conducted at least once every 24 months. [District NSR Rule, 4701, and 4702] Federally Enforceable Through Title V Permit
13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

14. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
15. Sampling facilities for source testing shall be provided in accordance with the provisions of District Rule 1081 (as amended 12/16/93). [District Rule 1081] Federally Enforceable Through Title V Permit
16. Source testing for NO<sub>x</sub> shall be conducted utilizing CARB method 100 or EPA method 7E. [District Rule 4701] Federally Enforceable Through Title V Permit
17. Source testing for CO shall be conducted utilizing CARB method 100 or EPA method 10. [District Rule 4701] Federally Enforceable Through Title V Permit
18. Source testing for VOC emission concentration shall be conducted utilizing EPA method 25 or EPA method 18, referenced as methane. [District Rule 4701] Federally Enforceable Through Title V Permit
19. Source testing for SO<sub>x</sub> shall be conducted utilizing EPA method 8 and ARB method 100. [District Rule 4801] Federally Enforceable Through Title V Permit
20. Source testing for PM<sub>10</sub> emissions shall be conducted utilizing CARB method 501 in conjunction with CARB method 5, EPA methods 201 and 202 or EPA methods 201A and 202. If the facility agrees that the PM<sub>10</sub> emissions are equal to the total particulate matter emissions then source testing for PM<sub>10</sub> may be conducted utilizing CARB method 5 including the back half or CARB method 17 including the back half. [District NSR Rule] Federally Enforceable Through Title V Permit
21. The permittee shall monitor the hydrogen sulfide influent concentration on a daily basis with the use of a Draeger tube or District approved equivalent method. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The permittee shall monitor and record the stack concentration of NO<sub>x</sub> at least once every calendar quarter (in which a source test is not performed) using a portable emission monitor that meets District specifications. All emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
23. The permittee shall monitor and record the stack concentration of O<sub>2</sub> at least once every month using a portable emissions monitor that meets District specifications. [In-stack O<sub>2</sub> monitors may be allowed if approved by the APCO]. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 1 day of restarting the engine unless monitoring has been performed within the last month. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
24. The exhaust gas O<sub>2</sub> concentration shall be maintained between 8.83 to 9.20 % O<sub>2</sub> for digester gas and between 9.55% to 9.89% for natural gas. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
25. If the concentration, as measured by the portable analyzer, is outside the permitted range, the permittee shall return the O<sub>2</sub> to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue outside the permitted range after 8 hours, the permittee shall notify the District within the following 1 hour, and conduct a certified source test within the 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
26. The permittee shall maintain records of: (1) the date and time of O<sub>2</sub> and NO<sub>x</sub> measurements, (2) the O<sub>2</sub> and NO<sub>x</sub> concentration in percent, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions limits with the acceptable range. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

27. Records of the quantity and type of fuel burned, in BTUs, the influent hydrogen sulfide concentration, and of the annual SO<sub>x</sub> emissions shall be kept. [District NSR Rule] Federally Enforceable Through Title V Permit
28. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.